IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

Fidelis J. Badaiki,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Case No.: 4:19-cv-00371
	§	
Cameron International Corporation,	§	
	§	
Defendant.	§	
	§	

DECLARATION OF JAMES H. NYE

I, James H. Nye, hereby declare as follows:

- My name is James H. Nye. I am over the age of 21 and fully competent to make this
 declaration. I have personal knowledge of all the facts in this declaration and they are all
 true and correct.
- 2. I am a partner with the law firm of Winston & Strawn LLP. I and my firm acted as counsel for Defendant Cameron International Corporation ("Cameron") in the above styled litigation and I am the attorney-in-charge. As attorney-in-charge, I am responsible for reviewing and approving the bills and invoices in this case and as such, have knowledge of the facts contained therein. I also have personal knowledge of all other facts in this declaration.
- 3. Through my practice and experience, I am familiar with the normal and customary fees charged for legal services in complex civil litigation in the Houston metropolitan area considering the time expended, the amount in controversy, the complexity of the case, the experience, reputation, ability and billing rates of the attorneys and staff involved, the expertise involved, and other criteria upon which fees are based according to the State Bar

of Texas rules and Texas Code of Professional Responsibility. I have been and continue to stay apprised of the market rates for attorneys practicing in complex litigation such as this. I am also aware of various court opinions issued by the Texas Supreme Court, U.S. Court of Appeals for the Fifth Circuit, and district courts within the Fifth Circuit, governing the award of fees. I have previously served in cases as an attorneys' fees expert, and I am knowledgeable of the fees and work required to defend an action such as this.

- 4. I have reviewed the parties' respective pleadings and orders from the Court. Based on my experience as a civil litigator, I am aware of the preparation and work necessary to investigate and to pursue litigation such as this one. I have reviewed all billing invoices in this matter.
- 5. As a result of my practice and experience as counsel in complex civil litigation, I have reviewed substantial numbers of billing invoices and times entries in matters like this. My experience and the additional facts set forth below inform my opinion in this case.

A. Lodestar Overview

- 6. As an overview to my more detailed opinions below, the hours expended by counsel for Cameron to prevail in this matter and the rates charged are both, at a minimum, reasonable and necessary, which represents a presumptively reasonable lodestar amount of \$252,609.50. Next, an upward adjustment would be appropriate—although Cameron is not requesting this upward adjustment.
- 7. Moreover, in an additional effort to conservatively estimate the reasonable number of hours spent on this matter and demonstrate an additional level of billing judgment, Cameron's lodestar amount above reflects a voluntarily deduction from its hour total of all time spent and billed by practice attorneys, paralegals, and non-attorney professionals.

- 8. In addition, Cameron also deducted from its lodestar amount all attorney time for those attorneys who spent less than ten hours total on the case in recognition that such time may include time spent gaining familiarity with the case.
- Cameron also voluntarily deducted from its lodestar amount all attorney time for partners, including myself.

B. Lodestar Step 1: Reasonable Number of Hours Expended

- 10. Since the inception of this case, the professionals at Winston & Strawn LLP have overseen the day-to-day operations of the district court litigation and related strategy.
- 11. Based on a review of Winston & Strawn LLP's billing records and practices, my understanding of the necessary case tasks, and my experience, it is my opinion that none of the hours expended were excessive, duplicative, or inadequately documented.
- 12. It is also my opinion that Winston & Strawn LLP's invoices and litigation strategy also indicate sound "billing judgment." Tasks were assigned to the personnel who could handle them most efficiently whenever possible, including to associate attorneys or paralegals whenever possible. Moreover, Winston & Strawn LLP applied significant discounts to its standard billing rates under its arrangement with Cameron for this case.
- 13. During the relevant time period, professionals at Winston & Strawn LLP expended attorney hours, for which Cameron was billed, on necessary case tasks, including: 1) drafting of the answer; 2) drafting motions, including the Motion to Dismiss and Motion for Summary Judgment; 3) responding to motions; 4) preparing and participating at court-order hearings; 5) preparing for Plaintiff's deposition.

14. Without including the voluntary exclusions stated, the Specific Attorney Time and General Attorney Time billed for the individuals who performed the 565.10 hours of relevant work are shown in Table 1 below.

Table 1							
Timekeeper	Time in 2019 (Hours)	Time in 2020 (Hours)	Time in 2021 (Hours)				
Evan Lewis (Associate)	n/a	15.70	n/a				
Benjamin Williams (Associate)	103.20	384.60	40.80				
Caitlin Gernert (Associate)	n/a	n/a	20.80				

15. Accordingly, Cameron requests that it be compensated for a reasonable 565.10 hours.

C. Lodestar Step 2: Reasonable Hourly Rate

16. Under its fee arrangement with Cameron, Winston & Strawn LLP charged significantly discounted rates for the Winston & Strawn LLP attorneys who worked on this matter as shown in Table 2 below. These discounted rates were negotiated with Cameron, representing rates that are typically materially less than those charged to and paid by the firm's civil litigation clients for similar matters.

Table 2							
Timekeeper	Discounted rate 2019	Discounted rate 2020	Discounted rate 2021				
Evan Lewis (Associate)	n/a	\$405.00	n/a				
Benjamin Williams (Associate)	\$445.00	\$445.00	\$445.00				
Caitlin Gernert (Associate)	n/a	n/a	\$530.00				

17. Based on the qualifications of the Winston & Strawn LLP professionals in Table 2 (as explained below and above), the rates above are at least commensurate with, if not well

below, the normal and customary rates charged in the Houston metropolitan area for complex civil litigation, and materially less than the rates of top tier firms like Winston & Strawn LLP, considering the time expended, the amount in controversy, the complexity of the case, the experience, reputation, ability and billing rates of the attorneys and staff involved, and the expertise involved.

18. In my opinion the rates listed in Table 2 are at least commensurate with the normal and customary rates charged in the Houston metropolitan area for complex civil litigation, and materially less than the rates for top tier firms such as Winston & Strawn LLP.

D. Total reasonable and necessary attorneys' fees

19. Based on the above analysis, it is my opinion that the total reasonable and necessary attorneys' fees as an outcome of the lodestar method is represented in Table 3 below.

Table 3							
Timekeeper	Hours	Discounted Rate	Total				
Evan Lewis	15.70	\$405.00	\$6,358.50				
(Associate)							
Benjamin Williams	528.60	\$445.00	\$235,227.00				
(Associate)							
Caitlin Gernert	20.80	\$530.00	\$11,024.00				
(Associate)							
Total	565.10		\$252,609.50				

20. Computing all voluntary exclusions stated above, Cameron is giving a \$289,292.00 discount by not computing the billed time for partners, paralegals, practice attorneys, law clerks, and other associates.

E. Other Expenses

21. Reasonable expenses were incurred in the litigation, amounting to a total of \$12,699.03.

These costs were for legal research, Pacer, outside vendors, court reporter, etc. However,

Cameron requests expenses only for \$5,631.48, and true and correct copies of the invoices for this amount are attached as Exhibit 1-A.

F. Conclusion

- 22. Cameron requests an award of \$252,609.50 for attorneys' fees and \$5,631.48 for other expenses. This is the result of the total fees and costs charged minus the deductions and exclusions.
- 23. Accordingly, it is my opinion that the requested amount of \$258,240.98 represents, at a minimum, a reasonable and conservative estimate of attorneys' fees and other expenses incurred in connection with defending Plaintiff's claims.

I declare under penalty of perjury that the foregoing is true and correct on December 10, 2021, in Houston, Texas.

<u>/s/ James H. Nye</u> James H. Nye

Exhibit 1-A

Fowler, Lucy C.

From:

Lewis, Kimberly

Sent:

Monday, February 04, 2019 9:19 AM

To:

Fowler, Lucy C.

Subject:

FW: Filing Submitted for Case: 201888252; BADAIKI, FIDELIS J v SCHLUMBERGER

COMPANY; Envelope Number: 30893319

Please bill to 170037.00131.

Thanks

Kimberly A. Lewis

Senior Paralegal

Winston & Strawn LLP T: +1 713-651-2600 D: +1 713-651-2691 F: +1 713-651-2700

winston.com

WINSTON &STRAWN

From: No-Reply@eFileTexas.gov < No-Reply@eFileTexas.gov >

Sent: Monday, February 4, 2019 9:17 AM

To: Lewis, Kimberly <KALewis@winston.com>

Subject: Filing Submitted for Case: 201888252; BADAIKI, FIDELIS J v SCHLUMBERGER COMPANY; Envelope Number:

30893319



Filing Submitted

Envelope Number: 30893319
Case Number: 201888252
Case Style: BADAIKI, FIDELIS J v
SCHLUMBERGER COMPANY

The filing below has been submitted to the clerk's office for review. Please allow 24 - 48 hours for clerk office processing.

Filing Details					
Court	Harris County District Civil				
Date/Time Submitted	2/4/2019 9:16 AM CST				
Filing Type	Notice				
Filing Description	Notice of Removal				
Type of Filing	EFileAndServe				
Filed By	Kimberly Lewis				

Filing Attorney Hugh E. Tanner

Fee Details

Your account is never charged until your filing is accepted. If you see any pending charges on your account prior to acceptance, this is an authorization hold to ensure the funds are available so your filing can be accepted without delay.

If the filing is canceled or rejected these funds will be released and will return to your account according to your financial institution's policies (typically 3-10 business days).

This envelope is pending review and fees may change.

Case Fee Information\$2.06Payment Service Fees\$0.06Court Transaction Fees\$2.00Notice\$0.00

Total:\$2.06 (The envelope still has pending filings and the fees are subject to change)

Document Details					
Lead Document	Notice of Removal - State.pdf				
Lead Document Page Count	2				
File Copy	Download Document				
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Email: support@eFileTexas.gov

Please do not reply to this email. It was automatically generated.

Fowler, Lucy C.

From:

notification@pay.gov

Sent:

Monday, February 04, 2019 8:57 AM

To:

Lewis, Kimberly; Fowler, Lucy C.

Subject:

Pay.gov Payment Confirmation: TXSD CM ECF

Your payment has been submitted to Pay.gov and the details are below. If you have any questions or you wish to cancel this payment, please contact Financial Services Group at (713) 250-5875.

Application Name: TXSD CM ECF Pay.gov Tracking ID: 26F6DSAH Agency Tracking ID: 0541-21785904

Transaction Type: Sale

Transaction Date: Feb 4, 2019 9:57:22 AM

Account Holder Name: Lucy Fowler Transaction Amount: \$400.00

Card Type: MasterCard

Card Number: ********5752

170037.131

Notice of Removal Hugh Tanner

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.

Case 4:19-cv-00371 Document 119-1 Filed on 12/10/21 in TXSD Page 11 of 31 PAYMENT DUE IN 15 DAYS

Account Invoice Date 173 48578 2/25/2019

WINSTON STRAWN 1111 LOUISIANA HOUSTON, TX 77002 Remit to:

REFERENCE 170037.00131

\$18.00

Mach 5 Couriers, Inc. P O BOX 52490 Houston, TX 77052

INVOICE DETAIL							
REFERENCE#	1	SENDER		I	RECIPIENT		NET CHARGE
170037.00131		KIMBERLY LE	WIS				
		WINSTON ST			ANDREW HANEN	(WESTMORELAND)	
		1111 LOUIS	SIANA		515 RUSK		
		2500			8613		
		HOUSTON,	TX 77002		HOUSTON, TX 77	002	
	549734	SHIPPED	2/12/2019	8:00:00 AM	DELIVERED Feb 1	2 2019 8:48AM	\$18.00

****SUBTOTAL FOR THIS REFERENCE NUMBER****

Case 4:19-cv-00371 Document 119-1 Filed on 12/10/21 in TXSD Page 12 of 31 COURTHOUSE NEWS SERVICE

30 North Raymond Ave., Suite 310 Pasadena, CA 91103

Billing Questions: (626) 577-6726 Technical Questions: (626) 577-6700

Email: accounting@courthousenews.com

Invoice # 673478

INVOICE

	INVOICE				
TX Document Download	Downloaded copy of document number: 2020-16532 Fidelis Johnson Badaiki v. Schlumberger Holdings Corporation; Schlumberger Ltd.; Cameron International Corporation; Pala Kibsgaard; Olivier Le Peuch; Steve McKenzie; Jamilah Cummings; Marisa Henning; John Corkhill; Nathan Cooper; Ray Arbor; Jay Jurena; Ed Gaude Court: Harris County District Court Ordered On: 03/26/20 Ordered By: Karol Howard Phone #: 2136151798 Additional Info: 170037.131/B.Williams	1	\$5.00	\$0.30	\$5.30
Copy Fee	Copy Fee (Copies 1 and greater = \$0.00)	4	\$0.00	\$0.00	\$0.00

Please make checks payable to COURTHOUSE NEWS SERVICE and reference invoice # on check. Our Tax ID # is: 95-4652674

Case 4:19-cv-00371 Document 119-1 Filed on 12/10/21 in TXSD Page 13 of 31 COURTHOUSE NEWS SERVICE

30 North Raymond Ave., Suite 310 Pasadena, CA 91103

Billing Questions: (626) 577-6726 Technical Questions: (626) 577-6700

Email: accounting@courthousenews.com

Invoice # 673478

INVOICE

	11110102				
TX Document Download	Downloaded copy of document number: 2020-16523 Fidelis Johnson Badaiki v. Schlumberger Holdings Corporation; Schlumberger NV; Schlumberger BV; Schlumberger Ltd.; Schlumberger Technology Corporation; Cameron International Corporation; Paal Kibsgaard; Olivier Le Peuch; Steve McKenzie; Jamilah Cummings; Marisa Henning; John Corkhill; Nathan Cooper; Ray Arbor; Jay Jurena; Ed Gaude Court: Harris County District Court Ordered On: 03/26/20 Ordered By: Karol Howard Phone #: 2136151798 Additional Info: 170037.131/B.Williams	1	\$5.00	\$0.30	\$5.3
Copy Fee	Copy Fee (Copies 1 and greater = \$0.00)	4	\$0.00	\$0.00	\$0.0
)				

From: Lewis, Kimberly
To: Stallworth, Robin
Cc: Lewis, Kimberly

Subject: FW: Case No. 2020-16523; Badaiki v. Schlumberger Holdings Corp., et al.

Date: Tuesday, July 07, 2020 11:55:53 AM

Attachments: <u>DOC047.pdf</u>

Can you please request a check in the amount of \$308 which is the cost for a hearing transcript to be prepared within 4-6 days.

Please make the check payable to:

Monica D. Grassmuck 1252 San Benedetto League City, TX 77573

Attached is a copy of her W-9.

If I could get the check as soon as possible that would be great.

Let me know if you need additional information.

Thank you,

Kimberly A. Lewis

Senior Paralegal

Winston & Strawn LLP T: +1 713-651-2600 D: +1 713-651-2691

F: +1 713-651-2700

winston.com



From: Williams, Ben < BWilliams@winston.com>

Sent: Tuesday, July 7, 2020 11:50 AM

To: Lewis, Kimberly <KALewis@winston.com>

Subject: RE: Case No. 2020-16523; Badaiki v. Schlumberger Holdings Corp., et al.

4–6 days. Please get the ball rolling as quick as we can. Thanks.

Ben Williams

Winston & Strawn LLP

T: +1 713-651-2600 D: +1 713-651-2763

F: +1 713-651-2700

winston.com



From: Lewis, Kimberly < <u>KALewis@winston.com</u>>

Sent: Tuesday, July 7, 2020 11:49 AM

To: Williams, Ben < BWilliams@winston.com>

Subject: FW: Case No. 2020-16523; Badaiki v. Schlumberger Holdings Corp., et al.

Ben,

Below is the cost for the June 22 transcript you want. How many day turnaround do you want?

Keep in mind I have to request a check which may take a couple of days.

Thanks,

Kimberly A. Lewis

Senior Paralegal

Winston & Strawn LLP

T: +1 713-651-2600

D: +1 713-651-2691 F: +1 713-651-2700

winston.com



From: Grassmuck, Monica (DCA) < Monica Grassmuck@Justex.net >

Sent: Tuesday, July 7, 2020 11:41 AM

To: Lewis, Kimberly < KALewis@winston.com>

Subject: Re: Case No. 2020-16523; Badaiki v. Schlumberger Holdings Corp., et al.

Good morning. The cost for a 10-business day turnaround will be \$196, for a 7- to 9-business day hold it will be \$252, for a 4- to 6-business day turnaround it will be \$308. You can send a check to Monica D. Grassmuck at 1252 San Benedetto, League City, TX 77573. Once payment is received, please allow the allotted time for the transcript to be e-mailed to you.

Please e-mail me for future requests for a quicker response time.

Thank you,

Monica D. Grassmuck, CSR Official Court Reporter 125th Civil District Court

201 Caroline Street, 10th Floor Houston, Texas 77002 832.927.2554

From: Lewis, Kimberly < <u>KALewis@winston.com</u>>

Sent: Tuesday, July 7, 2020 11:06:55 AM

To: Grassmuck, Monica (DCA)

Cc: Lewis, Kimberly

Subject: FW: Case No. 2020-16523; Badaiki v. Schlumberger Holdings Corp., et al.

Good morning,

This email is a follow-up to my voice mails regarding obtaining a transcript of the June 22, 2020 Status Conference. We would like to obtain the copy as soon as possible. Please provide me with the cost of the transcript and I will forward a check to you.

Please let me know if you need additional information and thank you in advance for your assistance.

Kimberly A. Lewis

Senior Paralegal

Winston & Strawn LLP 800 Capitol St., Suite 2400 Houston, TX 77002-2925

D: +1 713-651-2691 F: +1 713-651-2700

VCard | Email | winston.com



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Case 4:19-cv-00371 Document 119-1 Filed on 12/10/21 in TXSD Page 17 of 31 PAYMENT DUE IN 15 DAYS

Account Invoice Date 173 54253 7/25/2020

WINSTON STRAWN 800 CAPITAL HOUSTON, TX 77002 Remit to:
Mach 5 Couriers, Inc.
P O BOX 52490
Houston, TX 77052

INVOICE DETAIL					
REFERENCE#	SENDER	RECIPIENT	NET CHARGE		

170037.00131

RUSSELL PATTON

WINSTON STRAWN

515 RUSK

800 CAPITAL

2400

617434

SHIPPED

HOUSTON, TX 77002

HOUSTON, TX 77002

FEDERAL COURTHOUSE (WARD)

7/2/2020 12:26:00 PM DELIVERED Jul 2 2020 1:56PM

\$14.95

	Jase 45pg wa	THIP K	@@R&&Q& NUMBER****	ed orefler/en/0/2170037	XISI Page 18 of 3	\$14.95
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70057.151		WINSTON STR		JUDGE GRAY MILLER (CLERK CHRIS)	
		800 CAPITAL		515 RUSK	,	
		2400		9010C		
		HOUSTON, T	X 77002	HOUSTON, TX 77002		
	619045	SHIPPED	7/20/2020 2:03:00 PM	1 DELIVERED Jul 20 202	0 2:33PM	\$14.95
	****SUBTOTA	L FOR THIS RE	FERENCE NUMBER****	REFERENCE 170037	.131	\$14.95

Harris County District Clerk Order Number: 934700

Customer / Shipping Information

Date: 6/16/2020 2:39:57 PM Ship Method: Download (zipped)

Customer: Kimberly Lewis

1111 Louisiana St

Suite 2500

Houston, TX 77002

Order Detail Information

Case: 201807160-7 SPM NAM LLC vs SM ENERGY COMPANY [Doc# : 89089055] 2	pages	\$2.00
Case: 202016523-7 BADAIKI, FIDELIS JOHNSON vs SCHLUMBERGER HOLDINGS CORPORATION [Doc# : 89870214]	4	pages	\$4.00
Case: 202016523-7 BADAIKI, FIDELIS JOHNSON vs SCHLUMBERGER HOLDINGS CORPORATION [Doc# : 89870221]	1	page	\$1.00
Case: 202016523-7 BADAIKI, FIDELIS JOHNSON vs SCHLUMBERGER HOLDINGS CORPORATION [Doc# : 89870230]	15	5 pages	\$15.00
Case: 202016523-7 BADAIKI, FIDELIS JOHNSON vs SCHLUMBERGER HOLDINGS CORPORATION [Doc# : 90322943]	5	pages	\$5.00
Case: 202016523-7 BADAIKI, FIDELIS JOHNSON vs SCHLUMBERGER HOLDINGS CORPORATION [Doc# : 90322944]	5	pages	\$5.00
Case: 202016523-7 BADAIKI, FIDELIS JOHNSON vs SCHLUMBERGER HOLDINGS CORPORATION [Doc# : 90322945]	5	pages	\$5.00
Case: 202016523-7 BADAIKI, FIDELIS JOHNSON vs SCHLUMBERGER HOLDINGS CORPORATION [Doc# : 90322946]	1	page	\$1.00
Case: 202016523-7 BADAIKI, FIDELIS JOHNSON vs SCHLUMBERGER HOLDINGS CORPORATION [Doc# : 90672492]	11	l pages	\$11.00
Case: 202016523-7 BADAIKI, FIDELIS JOHNSON vs SCHLUMBERGER HOLDINGS CORPORATION [Doc# : 90672493]	2	pages	\$2.00
Case: 202016523-7 BADAIKI, FIDELIS JOHNSON vs SCHLUMBERGER HOLDINGS CORPORATION [Doc# : 90856012]	14	l pages	\$14.00
Case: 202016523-7 BADAIKI, FIDELIS JOHNSON vs SCHLUMBERGER HOLDINGS CORPORATION [Doc# : 90856013]	1	page	\$1.00
Case: 202016523-7 BADAIKI, FIDELIS JOHNSON vs SCHLUMBERGER HOLDINGS CORPORATION [Doc# : 90856014]	9	pages	\$9.00
Case: 202016523-7 BADAIKI, FIDELIS JOHNSON vs SCHLUMBERGER HOLDINGS CORPORATION [Doc# : 90856015]	1	page	\$1.00

Payment Information

Card: XXXXXXXXXXX Subtotal: \$76.00

Total: \$76.00

Harris County District Clerk Order Number: 945751

Customer / Shipping Information

Date:

7/21/2020 2:57:59 PM

Ship Method:

Download (zipped)

Customer:

Moore, Nita

Houston, TX 77002

Order	Detail	Information
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Case: 202016532-7 BADAIKI, FIDELIS JOHNSON vs SCHLUMBERGER HOLDINGS CORPORATION [Doc#: 90998493]	1 page	\$1.00
Case: 202016532-7 BADAIKI, FIDELIS JOHNSON vs SCHLUMBERGER HOLDINGS CORPORATION [Doc#: 91004124]	2 pages	\$2.00
Case: 202016532-7 BADAIKI, FIDELIS JOHNSON vs SCHLUMBERGER HOLDINGS CORPORATION [Doc#: 91246970]	20 pages	\$20.00
Case: 202016532-7 BADAIKI, FIDELIS JOHNSON vs SCHLUMBERGER HOLDINGS CORPORATION [Doc#: 91246971]	3 pages	\$3.00
Case: 202016532-7 BADAIKI, FIDELIS JOHNSON vs SCHLUMBERGER HOLDINGS CORPORATION [Doc#: 91246972]	5 pages	\$5.00
Case: 202016532-7 BADAIKI, FIDELIS JOHNSON vs SCHLUMBERGER HOLDINGS CORPORATION [Doc#: 91353017]	1 page	\$1.00

Payment Information

Card:

XXXXXXXXXX

Subtotal:

\$32.00

Total:

\$32.00

Case 4:19-cv-00371 Document 119-1 Filed on 12/10/21 in TXSD Page 21 of 31

INVOICE

ALL Litigation & Video Service, LLC 1322 Space Park Drive, B137 Houston, TX 77058-3541 Phone:888.310.ALVS (2587) Fax:888.310.ALVS (2587)

> Benjamin D. Williams Winston & Strawn, LLP 800 Capital, Suite 2400 Houston, TX 77002

Invoice No.	Invoice Date	Job No.		
28957	10/13/2020	23896		
Job Date Case No.				
9/28/2020	4:19-cv-00371			
Case Name				
FIDELIS J. BADAIKI V. CAMERON INTERNATIONAL CORPORATION				
Payment Terms				
Due upon receipt				

CERTIFICATE OF NON-APPEARANCE

FIDELIS J. BADAIKI (CERTIFICATE OF NON-APPEARANCE)

350.00

TOTAL DUE >>> \$350.00AFTER 11/12/2020 PAY \$371.00

Client Matter No. : 170037.00131

MAKE CHECK PAYABLE TO ALVS, Inc. & UPDATE THE EIN NO. 83-3154911

Payment not contingent on client reimbursement. If turned over to collections, jurisdiction will be Harris County, Texas, and you agree to pay all collection costs and attorney fees.

Tax ID: 83-3154911 Phone: (713) 651-2600 Fax:(713) 651-2700

 ${\it Please \ detach \ bottom \ portion \ and \ return \ with \ payment.}$

Benjamin D. Williams Winston & Strawn, LLP 800 Capital, Suite 2400 Houston, TX 77002 Invoice No. : 28957
Invoice Date : 10/13/2020 **Total Due : \$350.00**AFTER 11/12/2020 PAY \$371.00

| Remit To: | ALL Litigation & Video Service, LLC | BU ID | : 1-MAIN |
| 1322 Space Park Drive, B137 | Case No. | : 4:19-cv-00371 |

Case Name : FIDELIS J. BADAIKI V. CAMERON

INTERNATIONAL CORPORATION

Case 4:19-cv-00371 Document 119-1 Filed on 12/10/21 in TXSD Page 22 of 31

INVOICE

ALL Litigation & Video Service, LLC 1322 Space Park Drive, B137 Houston, TX 77058-3541 Phone:888.310.ALVS (2587) Fax:888.310.ALVS (2587)

> Benjamin D. Williams Winston & Strawn, LLP 800 Capital, Suite 2400 Houston, TX 77002

Invoice No.	Invoice Date	Job No.		
28963	10/20/2020	23897		
Job Date	Case No.			
9/28/2020	4:19-cv-00371			
	Case Name			
FIDELIS J. BADAIKI V. CAMERON INTERNATIONAL CORPORATION				
Payment Terms				
Due upon receipt				

CANCELATION FEE FOR:

FIDELIS J. BADAIKI

300.00

TOTAL DUE >>>

\$300.00

AFTER 11/19/2020 PAY

\$318.00

MAKE CHECK PAYABLE TO ALVS, Inc. & UPDATE THE EIN NO. 83-3154911

Payment not contingent on client reimbursement. If turned over to collections, jurisdiction will be Harris County, Texas, and you agree to pay all collection costs and attorney fees.

Tax ID: 83-3154911 Phone: (713) 651-2600 Fax:(713) 651-2700

Please detach bottom portion and return with payment.

Benjamin D. Williams Winston & Strawn, LLP 800 Capital, Suite 2400 Houston, TX 77002

Remit To: ALL Litigation & Video Service, LLC

1322 Space Park Drive, B137

Houston, TX 77058-3541

Invoice No. : 28963 Invoice Date : 10/20/2020 Total Due : \$300.00 AFTER 11/19/2020 PAY \$318.00

Job No. : 23897 BU ID : 1-MAIN : 4:19-cv-00371 Case No.

Case Name

: FIDELIS J. BADAIKI V. CAMERON INTERNATIONAL CORPORATION

Trèsmark Investigative Solutions

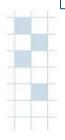
Invoice

P.O. Box 17476 Sugar Land TX 77496 +1.2815153163 - Phone markg@tresmarkinvestigations.com



http://www.tresmarkinvestigations.com
Bill To

Winston & Strawn Attn: Jim Nye 1111 Louisiana St. 25th Floor Houston, TX 77002



Invoice #	Amount Due	Invoice Status	Enclosed
CT-100007	\$1,136.63	Open	

Please detach top portion and return with your payment.

		Referral Date	Location	_	Case #
		08/31/2020	Texas		9-20-02513-01
Date	Activity		Quantity	Rate	Amount
09/03/2020	Fidelis Johnson Badaiki / ASSET - Asset Search		1	\$350	\$350.00
09/03/2020	Fidelis Johnson Badaiki / SOC - Social Media Investigat	ion	1	\$250	\$250.00
09/03/2020	Fidelis Johnson Badaiki / BAS - Bank Account Search		1	\$450	\$450.00
				Subtotal	\$1,050.00
				Subtotal Tax	\$1,050.00
				Total	\$1,136.63

Payment due upon receipt. Please make all checks payable to Trèsmark Investigative Solutions Agency, Inc. Thank you for your business and we look forward to working with you again in the future!

Trèsmark Investigative Solutions

Invoice

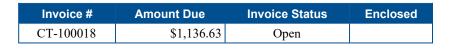
P.O. Box 17476 Sugar Land TX 77496 +1.2815153163 - Phone

markg@tresmarkinvestigations.com http://www.tresmarkinvestigations.com



Winston & Strawn Attn: Jim Nye 1111 Louisiana St. 25th Floor Houston, TX 77002





Please detach top portion and return with your payment.

		Referral Date	Location		Case #
		08/31/2020		INV-0	9-20-02514-01
Date	Activity		Quantity	Rate	Amount
09/03/2020	Karima R. Foster / ASSET - Asset Search		1	\$350	\$350.00
09/03/2020	Karima R. Foster / SOC - Social Media Investigation		1	\$250	\$250.00
09/03/2020	Karima R. Foster / BAS - Bank Account Search		1	\$450	\$450.00
				Subtotal	\$1,050,00
				Subtotal Tax	\$1,050.00 \$86.63
				Total	\$1,136.63

Payment due upon receipt. Please make all checks payable to Trèsmark Investigative Solutions Agency, Inc. Thank you for your business and we look forward to working with you again in the future!

 From:
 Abing, Carol

 To:
 Berkowitz, Ann S.

Subject: FW: Badaiki v. Schlumberger Holdings Corp.; Cause No. 2020-1623 - Transcript Request

Date: Tuesday, November 10, 2020 2:42:15 PM

Attachments: W-9 Fillable-Signed 6.pdf

Hi Ann -

Can I ask you for another huge favor? Can you please submit this for a check request that we can receive tomorrow morning? Ben said he can hand deliver it to her in court tomorrow.

Let me know!

Thank you!!

Carol

From: Grassmuck, Monica (DCA) < Monica_Grassmuck@Justex.net>

Sent: Tuesday, November 10, 2020 1:26 PM To: Abing, Carol <CAbing@winston.com>

Subject: Re: Badaiki v. Schlumberger Holdings Corp.; Cause No. 2020-1623 - Transcript Request

Good afternoon. The cost for the June 12th hearing will be \$125. You may send a check payable to Monica D. Grassmuck at 1252 San Benedetto, League City, Texas 77573 Once payment is received, please allow 10 or more business days for the transcript to be e-mailed to you.

Thank you,

Monica D. Grassmuck, CSR Official Court Reporter 125th Civil District Court 201 Caroline Street, 10th Floor Houston, Texas 77002 832.927.2554

From: Abing, Carol < CAbing@winston.com>

Case 4:19-cv-00371 Document 119-1 Filed on 12/10/21 in TXSD Page 26 of 31 PAYMENT DUE IN 15 DAYS

Account Invoice Date 173 55208 11/25/2020

WINSTON STRAWN 800 CAPITAL HOUSTON, TX 77002 Remit to:

REFERENCE 170037.00131

\$14.95

Mach 5 Couriers, Inc. P O BOX 52490 Houston, TX 77052

INVOICE DETAIL						
REFERENCE#	1	SENDER	I	RECIPIENT	NE	T CHARGE
170037.00131	ı	ANN BERKOW	/ITZ			
	,	WINSTON ST	RAWN	MONICA GRASSMUCK 10TH FLR.)	(125TH CLERK DESK	
		800 CAPITA	L	201 CAROLINE		
		2400		10TH FLOOR		
		HOUSTON,		HOUSTON, TX 77002		
	630229	SHIPPED	11/11/2020 3:40:00 PM	1 DELIVERED Nov 11 2	020 4:21PM	\$14.9

****SUBTOTAL FOR THIS REFERENCE NUMBER****

INVOICE

1 of 1

ALL Litigation & Video Service, LLC 1322 Space Park Drive, B137 Houston, TX 77058-3541

Phone: 888.310.ALVS (2587) Fax: 888.310.ALVS

(2587)

James H. Nye Winston & Strawn, LLP 800 Capital, Suite 2400 Houston, TX 77002

Invoice No.	Invoice Date	Job No.		
31142	12/31/2020	26195		
Job Date	Case No.			
11/30/2020	4:19-cv-00371			
	Case Name			
FIDELIS J. BADAIKI V. CAMERON INTERNATIONAL CORPORATION				
Payment Terms				
Due upon receipt				

ORIGINAL TRANSCRIPT OF:

BADAIKI AUDIO FILES (NOTE RECORDINGS 43.3, 63.3, 64.3)

650.00

TOTAL DUE >>>

\$650.00

AFTER 1/30/2021 PAY

\$689.00

Location of Job : Houston, TX

MAKE CHECK PAYABLE TO ALVS, Inc. & UPDATE THE EIN NO. 83-3154911

Payment not contingent on client reimbursement. If turned over to collections, jurisdiction will be Harris County, Texas, and you agree to pay all collection costs and attorney fees.

Tax ID: 83-3154911

Please detach bottom portion and return with payment.

James H. Nye Winston & Strawn, LLP 800 Capital, Suite 2400 Houston, TX 77002 Invoice No. : 31142
Invoice Date : 12/31/2020 **Total Due** : **\$650.00**

AFTER 1/30/2021 PAY \$689.00

Remit To: ALL Litigation & Video Service, LLC 1322 Space Park Drive, B137 Houston, TX 77058-3541 Job No. : 26195 BU ID : 1-MAIN

Case No. : 4:19-cv-00371

Case Name : FIDELIS J. BADAIKI V. CAMERON

INTERNATIONAL CORPORATION

Trèsmark Investigative Solutions Agency,

Inc.

P.O. Box 17476 Sugar Land, TX 77496 US (281) 515-3163 tresmark@tresmarkinvestigations.com



INVOICE

BILL TO

Winston & Strawn Attn: Jim Nye 1111 Louisiana St. 25th Floor Houston, TX 77002

working with you again in the future!

SERVICE	DESCRIPTION		QTY	RATE	AMOUNT
Bank Account Search	Karima R. Foster / / BAS - Bank Ac	count Search	1	450.00	450.00T
Payment is due upon r	eceipt and is payable via check or credit card.	SUBTOTAL			450.00
Please make any checks payable to Trèsmark Investigative Solutions		TAX			37.13
Agency, Inc.		TOTAL			487.13
As always, thank you for your business and we look forward to		BALANCE DUE			\$487.13

Trèsmark Investigative Solutions Agency,

Inc.

P.O. Box 17476 Sugar Land, TX 77496 US (281) 515-3163 tresmark@tresmarkinvestigations.com



INVOICE

BILL TO

Winston & Strawn Attn: Jim Nye 1111 Louisiana St. 25th Floor Houston, TX 77002

working with you again in the future!

SERVICE	DESCRIPTION		QTY	RATE	AMOUNT
Bank Account Search	Fidelis Johnson Badaiki / / BAS - Ba Search	Fidelis Johnson Badaiki / / BAS - Bank Account Search			450.00T
Payment is due upon	receipt and is payable via check or credit card.	SUBTOTAL			450.00
Please make any checks payable to Trèsmark Investigative Solutions		TAX			37.13
Agency, Inc.		TOTAL			487.13
As always thank you	for your business and we look forward to	BALANCE DUE		9	\$487.13

Case 4:19-cv-00371 Document 119-1 <u>Filed on 12/10/21 in TXSD</u> Page 30 of 31

Corporations Section P.O.Box 13697 Austin, Texas 78711-3697



Ruth R. Hughs Secretary of State

Office of the Secretary of State Packing Slip

September 28, 2020

Page 1 of 1

Attn: Winston & Strawn LLP Winston & Strawn LLP 35 W. Wacker Drive Library - SF Chicago, IL 60601

Batch Number: 99850402 Batch Date: 09-28-2020

Client ID: 459006832 Return Method: Email

Client Reference: 170037.00131_B. Williams

Document Number	Document Detail	Number / Name	Page Count	Fee
998504020002	Find	Engineered Constructions		\$1.00
998504020003	Find by Global People Name	Fidelis Badaiki		\$1.00
		To	tal Fees:	\$2.00

Total Amount Charged to Client Account: \$2.00

(Applies to documents or orders where Client Account is the payment method)

Note to Customers Paying by Client Account: This is not a bill. Payments to your client account should be based on the monthly statement and not this packing slip. Amounts credited to your client account may be refunded upon request. Refunds (if applicable) will be processed within 10 business days.

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Phone: (512) 463-5555 FAX: (512) 463-5709 Dial: 7-1-1 for Relay Services

April 9, 2021

To: Mr. James H. Nye Winston & Strawn LLP 800 Capitol St.,, Suite 2400 Houston, Texas 77002

For: Copy of Reporter's Record heard on the 12th day of March, 2021 in Cause No. 2020-16523, Fidelis Johnson Badaiki vs. Schlumberger Holdings Corporation, et al.

Total Cost: \$47.50

Leticia Tafolla Deputy Court Reporter 1519 Moon Shadow Court Sugar Land, Texas 77479

Thank You!